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MEMO ENDORSED

May 6, 2020

VIA ECF

The Honorable Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *Ohio Imaging Associates, Inc. v. Radiology Partners, Inc., et al.*
Case No. 1:19-cv-02496-ER

Dear Judge Ramos:

This firm represents Plaintiff Ohio Imaging Associates, Inc. ("OIA") in the referenced action. We write on behalf of all parties to request an extension of the discovery deadlines in the Scheduling Order and an adjournment of the Case Management Conference scheduled for May 13, 2020.

The reason for the parties' joint request is that the COVID-19 epidemic has had a significant impact on the parties' ability to complete discovery within the current schedule. All parties are medical professional companies and their attention, understandably, has focused on their professional responsibilities during this difficult time. In addition, due to the social distancing requirements under states' laws, the parties are not currently able to schedule in-person depositions. We therefore request an extension of the discovery deadlines as set forth below:

Event	Current Deadline	New Deadline
Service of requests to admit, as well as additional interrogatories and requests for production	May 6, 2020	August 19, 2020
Non-Expert Depositions Completed	June 5, 2020	September 18, 2020
Expert Reports Served	July 10, 2020	October 23, 2020
Rebuttal Reports Served	July 31, 2020	November 13, 2020
All Discovery Complete	August 21, 2020	December 4, 2020

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The Honorable Edgardo Ramos
May 6, 2020
Page 2

This is the parties' third request for an extension of time. The parties previously requested an extension of the discovery schedule in order to engage in good faith settlement talks, and because the previous lead counsel for Plaintiff had left Ulmer & Berne LLP and new lead counsel required additional time in order to acquaint himself with the facts of the case. The Court granted the parties' previous requests.

Counsel for both parties can be available for a call at the Court's convenience to answer any questions or address any concerns regarding the instant request. Otherwise, Your Honor's consideration is greatly appreciated.

Respectfully submitted,

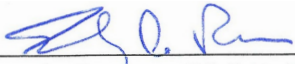
/s/ Michael D. Hoenig

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cc: Nicholas B. Wille, Esq. (via Email)
Lucas R. Smith, Esq. (via Email)
Dominic J. Picca, Esq. (via Email)
Ashleigh Karnell, Esq. (via Email)

The application is GRANTED. The discovery schedule shall be modified in accordance with the table on page 1 of this letter. Furthermore, the case management conference scheduled for May 13, 2020 is adjourned to December 4, 2020 at 11:00 a.m.

SO ORDERED



Edgardo Ramos, U.S.D.J
Dated: May. 06, 2020

New York, New York